

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK**

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VLADIMIR DOBROSMYLOV,

Plaintiff,

Civil Action No. 1:19-cv- 05122 (BMC)

NOTICE OF MOTION

v.

DESALES MEDIA GROUP, INC.,

Defendant.

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PLEASE TAKE NOTICE THAT, upon the accompanying (a) Memorandum of Law in Support of Defendant DeSales’ Renewed Motion for Summary Judgment; (b) Defendant Desales’ Local Civil Rule 56.1 Statement of Undisputed Material Facts in Support of its Motion for Renewed Summary Judgment; (c) Affidavit of William Maier, Chief Executive Officer of Defendant DeSales, dated May 25, 2021; (d) Declaration of Ned H. Bassen, Esq., dated May 25, 2021 and its accompanying exhibits, and all the prior pleadings and proceedings in this action, Defendant DeSales Media Group, Inc. (“Defendant DeSales”) will move this Court, before the Honorable Brian M. Cogan at the United States Courthouse for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, for an Order pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting summary judgment in favor of Defendant DeSales on all of Plaintiff’s remaining claims in the above-captioned case, and for such other relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to the Court's May 6, 2021 Order, Plaintiff's opposition to this motion is due June 15, 2021, and Defendant DeSales' reply is due June 25, 2021.

Dated: May 25, 2021
New York, New York

BECKER & POLIAKOFF LLP
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